

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	
)	
Defendant.)	

IBM’S NOTICE OF 30(B)(1) DEPOSITION OF RAJ BHATT

Please take notice that, pursuant to Federal Rules of Civil Procedure 30(b)(1), Plaintiff International Business Machines Corporation (“IBM”), by its counsel, will take the deposition upon oral examination of Raj Bhatt. The deposition will begin on August 31, 2017, at 9:30 a.m., at the offices of Desmarais LLP, 230 Park Avenue, New York, NY 10169, or at such time and place as the parties may agree.

The deposition will be before a Notary Public or other officer authorized by law to administer oaths and will be recorded using videographic, audiographic, and/or stenographic means, or a combination of those means.

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Dated: July 19, 2017
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By: /s/ Bindu A. Palapura

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